

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MARIA MASUCCI,

Plaintiff,

v.

NORMAN MINETA, Secretary,
U.S. Department of Transportation,

Defendant.

Civil Action No. 04-12537 RGS

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1

Pursuant to Local Rule 16.1(D), the parties to this action, plaintiff Maria Masucci, by and through her undersigned counsel, and the defendant Norman Mineta, Secretary, U.S. Department of Transportation, by and through his undersigned counsel of record, hereby submit this Joint Statement.

1. Proposed Plan for Discovery:

The parties propose that discovery proceed as follows:

Amendments to the pleadings	3/22/06
Service of all written discovery	4/5/06
Completion of fact depositions	7/31/06
Plaintiff's identification of experts	8/16/06
Defendant's identification of experts	9/15/06
Completion of expert discovery	10/31/06

2. Schedule For Filing of Motions

Any dispositive motions to be filed by November 17, 2006. Oppositions to be filed within 21 days thereafter.

3. Certification

The parties respectfully request that they be granted leave to file the necessary Rule 16.1(D)(4) certifications on or before February 22, 2006.

4. Referral to Magistrate Judge: The parties are willing to consent to have this matter decided by a Magistrate Judge.

5. Settlement/Mediation

The plaintiff's current demand for settlement is \$75,000.00. Defendant has not made a settlement offer at this time.

Respectfully submitted:

By the parties,

The Plaintiff,

The Defendant,

By Her Attorneys

By His Attorney

/s/ Michael J. Heineman
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Dated: February 13, 2006